

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Wendy C. H. Wellin, on behalf of the Estate
of Keith S. Wellin as its duly appointed
Special Administrator,

Plaintiff,

VS.

Thomas M. Farace, Esq., individually and
as agent for Nixon Peabody, LLP and
Nixon Peabody, LLP,

Defendants.

C/A No.: 2:16-cv-00414-DCN

**PLAINTIFF'S MOTION
FOR EXTENSION OF TIME**

Pursuant to Rule 6(b), Fed. R. Civ. P., and Local Civil Rules 6.01 and 7.02, Wendy C. H. Wellin on behalf of the Estate of Keith S. Wellin as Special Administrator of the Estate of Keith S. Wellin (the “Estate”) files this motion seeking to extend the deadline to file a response to Defendants’ *Daubert* Motion in Limine to Exclude Reports, Opinions, and Testimony of Dr. Edgar J. Weiss (ECF No. 285) for an additional seven days to April 12, 2023.

In support thereof, Plaintiff states that the parties have been conducting settlement negotiations in an attempt to resolve this case finally and completely.

The current deadline for Plaintiff to respond is April 5, 2023. This deadline has not previously been extended and will not affect other case deadlines.

Plaintiff is seeking this extension so that the parties may continue their settlement negotiations and so that Plaintiff will have time to draft a response to Defendants' motion if those negotiations are unsuccessful. The need for additional time is not due to a lack of diligence.

Counsel for Plaintiff has conferred with counsel for Defendants, and Defendants consent to the requested extension.

Respectfully submitted,

Dated: April 4, 2023
Sullivan's Island, South Carolina

s/ Badge Humphries

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